

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
(TRENTON VICINAGE)**

LARRY HAZZARD,
Plaintiff,

CIVIL ACTION NO. 08-00060

v.

STATE ATHLETIC CONTROL
BOARD OF THE STATE OF NEW
JERSEY AND OFFICE OF
ATTORNEY GENERAL OF THE
STATE OF NEW JERSEY,
Defendants.

**PLAINTIFF'S FIRST SET OF INTERROGATORIES
ADDRESSED TO DEFENDANTS STATE ATHLETIC CONTROL BOARD
OF THE STATE OF NEW JERSEY AND OFFICE OF ATTORNEY GENERAL
OF THE STATE OF NEW JERSEY**

Plaintiff, Larry Hazzard, by and through his undersigned counsel, Sidney L. Gold & Associates, P.C., hereby requests that Defendants answer, through their managing agents and employees, under oath, in accordance with the Federal Rules of Civil Procedure, the following interrogatories within thirty (30) days of service.

INSTRUCTIONS

1 Please note that all answers are to be made separately and fully and that an incomplete or evasive answer is a failure to answer. Where an interrogatory calls for an answer in more than one part, please separate the parts in your answer accordingly so that each part is clearly set out and understandable.



2. Where your knowledge or information in your possession is requested, such request includes knowledge or information in possession of your representatives, employees, agents, independent contractors, insurers, and unless privileged, your attorneys.

3. If you have only incomplete knowledge of the answer to an interrogatory, please answer to the extent of your knowledge and state specifically what part or area of the interrogatory you have only incomplete knowledge of and identify the person(s) who does or might have additional knowledge or information to complete the answer.

4. You may answer any interrogatory in whole or in part by attaching a document(s) which contains information sufficient to do so. Such document(s) may, if authenticated, be a copy of the original. Any document(s) used to answer an interrogatory may contain other information as well; however, the relevant portion of that document(s) must be so marked or indexed.

5 The term “document(s)” refers to all writings of any kind, including the originals and all nonidentical copies, whether different from the original by reason of any notation made on such copies or otherwise, including without limitation correspondence; memoranda; notes; diaries; statistics; letters; materials; invoices; orders; directives; interviews; telegrams; minutes; reports; studies; statements; transcripts; summaries; pamphlets; books; interoffice and intra-office communications; electronic mail (“e-mail”); text messages; real time “instant” messages; notations of any sort of

conversations, telephone calls, meetings or other communications; bulletins; printed matter; teletype; telefax; worksheets; and all drafts, alterations, modifications, changes and amendments of any of the foregoing; graphic or aural recordings or representations of any kind, including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, records, motion pictures; and electronic, mechanical, or electrical recordings or representations of any kind, including without limitation, tapes, cassettes, cartridges, discs, chips, and records.

6. Where the identity of a person is requested, please state his or her full name; any known nickname and aliases; age; social security number; present or last known home address and telephone number; present or last known position and business affiliation or employment and the address and telephone number there; and his or her employment and position at the time in question. For persons whose addresses are known to be inaccurate at this time, please state the most reliable contact address and contact person in your records.

7. Where a statement or description is requested, please include a specific account of what is being stated or described, including where applicable, without limitation, the date or time period involved; the identity of person(s) from whom the information was learned, who would have knowledge of that information, and/or who participated or were present; what happened in chronological order relating each identifiable event, response, act, or other thing; where by address and, if known,

ownership and use, the occurrence took place; the context or circumstances in which the occurrence took place; and what response or reaction existed to cause the occurrence to take place and/or was made after the occurrence took place.

8. Unless otherwise indicated, the time period each interrogatory refers to is that of the occurrences described or referred to in the Complaint and any amendments thereto.

9. For each interrogatory, please identify the person(s) from whom the information contained in the answer is obtained and the person(s) who swear to the truth of that information.

10. The terms "You" and "Defendants" shall mean State Athletic Control Board of the State of New Jersey and Office of Attorney General of the State of New Jersey, and their agents and employees, including persons acting or purporting to act on behalf of the Defendants.

11 Please note that you are under a continuing duty to supplement your responses.

INTERROGATORIES

1 Please identify all persons who have knowledge of the following

The circumstances surrounding Plaintiff's termination on or about
November 14, 2007;

Operation of the State of New Jersey's health and safety rules and
regulations governing public boxing and combative sporting events;

Plaintiff's complaints regarding Sylvester Cuyler's dereliction of his
duties;

Defendants' investigation(s) of Plaintiff's complaints regarding
Cuyler's dereliction of his duties;

(e) Meetings, conferences, or discussions where the aforesaid
investigation results were discussed; and

(f) Meetings, conferences, or discussions where Plaintiff's
termination was discussed.